

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ISAAC SUTOR,)
Plaintiff,)
v.)
AMERIGROUP CORPORATION,)
Defendant.)

JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER

Plaintiff Isaac Sutor and Defendant Amerigroup Corporation, through their respective attorneys of record, pursuant to Fed. R. Civ. P. 26(c), respectfully jointly move the Court for entry of the attached Stipulated Protective Order and state as follows in support:

1. The parties contemplate that discovery in this action may involve the production or disclosure of trade secrets, confidential personal, financial or business information and/or competitive information.

2. To ensure the protection of such information from public disclosure, the parties request entry of a Stipulated Protective Order in this case, a copy of which is attached hereto as

Exhibit 1.

3. As evidenced by the electronic signatures of counsel for the parties on the proposed Stipulated Protective Order, Plaintiff and Defendant, by counsel, consent to jointly move to enter the attached Stipulated Protective Order.

4. Because the parties have agreed to the entry of the proposed Stipulated Protective Order, no hearing on this Joint Motion is necessary unless desired by the Court.

WHEREFORE, Plaintiff Isaac Sutor and Defendant Amerigroup Corporation, by counsel, respectfully request that the Court grant their Joint Motion and enter the attached Stipulated Protective Order.

Respectfully submitted, this 20th day of April, 2020.

/s/ Kristi C. Kelly

Andrew J. Guzzo, VSB No. 82170
Casey S. Nash, VSB No. 84261
KELLY GUZZO, PLC
3925 Chain Bridge Rd, Suite 202
Fairfax, VA 22030
Telephone: (703) 424-7572
Facsimile: (703) 591-9285
Email: kkelly@kellyandcrandall.com
Email: aguzzo@kellyandcrandall.com
Email: casey@kellyandcrandall.com
Counsel for Plaintiff

By: /s/ Massie P. Cooper

Alan D. Wingfield, VSB No. 27489
Virginia Bell Flynn, VSB No. 79596
Massie P. Cooper, VSB No. 82510
TROUTMAN SANDERS LLP
1001 Haxall Point, 15th Floor
Richmond, Virginia 23219
Telephone: (804) 697-1350
Facsimile: (703) 448-6520
Email: alan.wingfield.@troutman.com
Email: virginia.flynn@troutman.com
Email: massie.cooper@troutman.com
Counsel for Defendant